

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

v.

[1] EDGARDO NAVARRO SUAREZ,
et al.

Defendants.

No.: 25-cr-163 (CVR)

MOTION SEEKING PROTECTIVE ORDER

The United States of America, by and through its undersigned attorneys, respectfully requests under Rule 16(d) of the Federal Rules of Criminal Procedure that the Court enter the proposed protective order, attached as Exhibit A, to expedite the flow of discovery material between the parties and adequately protect personal identity information, witness security, financial data, and non-party proprietary commercial information, all entitled to be kept confidential. Specifically, the discovery in this case contains, among other sensitive information, voluminous bank records, tax information, and personal identifiable information of the Defendants and third parties.

Respectfully submitted,

W. STEPHEN MULDROW
United States Attorney

s/Daniel J. Olinghouse
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CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing to be presented to the Clerk of the Court for filing and uploading to the CM/ECF system, which will generate an electronic notice of this filing to be sent to the parties.

s/Daniel J. Olinghouse
Daniel J. Olinghouse
Assistant United States Attorney